

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

ALLSTATES REFRACTORY  
CONTRACTORS, LLC,

Plaintiff,

v.

MARTIN J. WALSH, in his official capacity  
as Secretary of Labor,

UNITED STATES DEPARTMENT OF  
LABOR,

JAMES FREDERICK, in his official capacity  
as Acting Assistant Secretary of Labor for  
Occupational Safety and Health,

OCCUPATIONAL SAFETY AND HEALTH  
ADMINISTRATION,

Defendants.

Civil Action No. 3:21-cv-01864

Judge \_\_\_\_\_

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**DECLARATION OF J. BENJAMIN AGUIÑAGA**  
**IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

I, J. Benjamin Aguiñaga, submit this Declaration pursuant to 28 U.S.C. § 1746:

1. I am an associate in the Washington, D.C., office of the law firm Jones Day.
2. I am seeking admission *pro hac vice* to the Bar of this Court to represent Plaintiff

Allstates Refractory Contractors, LLC, in the above-captioned case.

3. My business contact information is as follows:

J. Benjamin Aguiñaga  
JONES DAY  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001-2113  
Telephone: (202) 879-3939  
Facsimile: (202) 626-1700  
E-Mail: jbaguinaga@jonesday.com.

4. I am admitted to practice law before and I am a member in good standing of the District of Columbia Bar (#1708051, admitted October 9, 2020) and the Texas Bar (#24101435, admitted November 4, 2016). In addition, I am admitted to practice law before and I am a member in good standing of the following federal courts: the United States Supreme Court and the United States Court of Appeals for the Fifth Circuit.

5. I have never been disbarred or suspended from practice before any court, department, bureau, or commission of any State or the United States. Nor have I ever received any reprimand from any such court, department, bureau, or commission pertaining to my conduct or fitness as a member of the bar.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of September, 2021.

/s/ J. Benjamin Aguiñaga

J. Benjamin Aguiñaga